

**Exhibit B**

**Van Holten, Luke H.**

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**From:** Dalsen, William D. <wdalsen@proskauer.com>  
**Sent:** Monday, June 24, 2024 4:22 PM  
**To:** Glueckstein, Brian D.; Dunne, Christopher J.; Croke, Jacob M.; Holland, Alexander S.  
**Cc:** Rosen, Brian S.; Sazant, Jordan; Marker, Dylan J.; Sanchez Tavarez, Genesis G.  
**Subject:** [EXTERNAL] FTX Trading v. LayerZero Labs - Discovery Requests and Notices of Deposition  
**Attachments:** 2024-06-24 - Defendants' Second Set of Requests for Production.pdf; 2024-06-24 - Defendants' First Set of Interrogatories.pdf; 2024-06-24 - Defendants' First Set of Requests for Admission.pdf; 2024-06-24 - Notice of Deposition to FTX Trading Ltd..pdf; 2024-06-24 - Notice of Deposition to MacLaurin (Alameda).pdf; 2024-06-24 - Notice of Deposition to West Realm Shires.pdf; 2024-06-24 - Notice of Deposition of Ellison.pdf; 2024-06-24 - Notice of Deposition of Ray.pdf

Counsel –

Please see the attached discovery requests and notices of deposition:

1. Defendants' Second Set of Requests for Production
2. Defendants' First Set of Interrogatories
3. Defendants' First Set of Requests for Admission
4. Notice of Rule 30(b)(6) Deposition of FTX Trading Ltd.
5. Notice of Rule 30(b)(6) Deposition of MacLaurin Investments Ltd. (f/k/a Alameda Ventures Ltd.)
6. Notice of Rule 30(b)(6) Deposition of West Realm Shires Services Inc.
7. Notice of Rule 30(b)(1) Deposition of Caroline Ellison
8. Notice of Rule 30(b)(1) Deposition of John J. Ray III

Thank you.

--Will

**William D. Dalsen**  
Senior Counsel

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**\*\*This is an external message from: wdalsen@proskauer.com \*\***

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

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FTX TRADING LTD., MACLAURIN  
INVESTMENTS LTD., f/k/a ALAMEDA  
VENTURES LTD., and WEST REALM  
SHIRES SERVICES, INC.,

Plaintiffs,

- against -

LAYERZERO LABS LTD., ARI LITAN, and  
SKIP & GOOSE LLC,

Defendants.

Adv. Pro. No. 23-50492-JTD

**DEFENDANTS' NOTICE OF DEPOSITION OF  
JOHN J. RAY III**

**TO:** John J. Ray III

**PLEASE TAKE NOTICE THAT**, pursuant to Federal Rules of Civil Procedure 26 and 30(b)(1), made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7030(b)(1), LayerZero Labs Ltd., Ari Litan, and Skip & Goose LLC (the "Defendants") will take the deposition upon oral examination of John J. Ray III.

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

**PLEASE TAKE FURTHER NOTICE THAT** the deposition will take place on September 24, 2024, starting at 9:00 a.m. local time at the offices of Proskauer Rose LLP, located at Eleven Times Square, New York, NY 10036, or at such other date, time, or location as the parties may agree or as may be ordered by the Court. Testimony will be recorded by video recording, audio recording, instant visual display of testimony, and by stenographic means before an officer duly authorized by law to take testimony and administer oaths, and will continue from day to day except Sundays and holidays until completed.

You are invited to attend and cross-examine.

Dated: June 24, 2024  
New York, New York

By: /s/ Brian S. Rosen  
M. Blake Cleary (No. 3614)  
R. Stephen McNeill (No. 5210)  
Sameen Rizvi (No. 6902)  
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-and-

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*Counsel to the Defendants*